

JAN -6 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRENDON DARNELL THOMAS,
JOSEPH ROBERT HOLLIMAN,
DEDRICK DESHON JORDAN,
TERRY JAMES WILLIAMS,
CLIFFORD DWIGHT DAVIS, JR.,
MARIA D. FLORES-CERVANTES,
JACQUELINE RENEE HARRIS,
THOMAS WILLIAM FOGLE,
RICHARD LEROY CLARK,
SARAH NICOLE REYNOLDS,
JOSEPH MICHAEL SURAUD,
ALEXANDRA MARNI CHAMBERS,
DEIDRE DENISE MEDCALF,
DAVID MICHAEL NUELLE,
MATTHEW JOSEPH AUBIN and
KEVIN JOHN KARLL,

Defendants.

4:21CR00013 RLW/SRW

No.

Counts 1, 2, 3 & 7
Counts 1, 4, 5 & 7
Counts 1 & 7
Counts 1 & 7
Counts 1, 6 & 7
Counts 1, 6 & 7
Counts 1 & 7
Counts 1 & 7
Counts 1 & 7
Counts 1 & 7
Counts 1 & 7
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Counts 1 & 7
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Counts 1 & 7

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning at an exact time unknown to the Grand Jury but including January 2019 and continuing thereafter to the date of this indictment, in the Eastern District of Missouri and elsewhere,

**BRENDON DARNELL THOMAS,
JOSEPH ROBERT HOLLIMAN,
DEDRICK DESHON JORDAN,**

**TERRY JAMES WILLIAMS,
CLIFFORD DWIGHT DAVIS, JR.,
MARIA D. FLORES-CERVANTES,
JACQUELINE RENEE HARRIS,
THOMAS WILLIAM FOGLE,
RICHARD LEROY CLARK,
SARAH NICOLE REYNOLDS,
JOSEPH MICHAEL SURAUD,
ALEXANDRA MARNI CHAMBERS,
DEIDRE DENISE MEDCALF,
DAVID MICHAEL NUELLE,
MATTHEW JOSEPH AUBIN and
KEVIN JOHN KARLL,**

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree with one or more other persons known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit: to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1),

All in violation of Title 21, United States Code, Section 846.

With respect to each defendant, the amount involved in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams or more of actual methamphetamine, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(viii).

COUNT TWO

The Grand Jury further charges that:

On or about June 18, 2020, within the Eastern District of Missouri,

BRENDON DARNELL THOMAS,

the defendant herein, did knowingly possess one or more firearms in furtherance of the

commission of a drug trafficking crime which may be prosecuted in a court of the United States, to-wit: conspiracy to distribute and to possess with the intent to distribute a controlled substance, including but not limited to methamphetamine, as charged in Count One herein.

In violation of Title 18, United States Code, Section 924(c).

COUNT THREE

The Grand Jury further charges that:

On or about June 18, 2020, in the Eastern District of Missouri,

BRENDON DARNELL THOMAS,

the Defendant herein, did knowingly possess one or more firearms, knowing he had previously been convicted in a court of law of one or more felony crimes punishable by a term of imprisonment exceeding one year, and the firearms previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The Grand Jury further charges that:

On or about June 18, 2020, within the Eastern District of Missouri,

JOSEPH ROBERT HOLLIMAN,

the defendant herein, did knowingly possess one or more firearms in furtherance of the commission of a drug trafficking crime which may be prosecuted in a court of the United States, to-wit: conspiracy to distribute and to possess with the intent to distribute a controlled substance, including but not limited to methamphetamine, as charged in Count One herein.

In violation of Title 18, United States Code, Section 924(c).

COUNT FIVE

The Grand Jury further charges that:

On or about June 18, 2020, in the Eastern District of Missouri,

JOSEPH ROBERT HOLLIMAN,

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been convicted in a court of law of one or more felony crimes punishable by a term of imprisonment exceeding one year, and the firearms previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

The Grand Jury further charges that:

On or about April 18, 2020, within the Eastern District of Missouri,

**CLIFFORD DWIGHT DAVIS and
MARIA D. FLORES-CERVANTES,**

the defendants herein, aided and abetted by each other and by others both known and unknown, did knowingly possess one or more firearms in furtherance of the commission of a drug trafficking crime which may be prosecuted in a court of the United States, to-wit: conspiracy to distribute and to possess with the intent to distribute a controlled substance, including but not limited to methamphetamine, as charged in Count One herein.

In violation of Title 18, United States Code, Sections 2 and 924(c).

COUNT SEVEN

The Grand Jury further charges that:

Beginning at a time unknown, but including January 2019 and continuing thereafter to the

date of this Indictment, in the Eastern District of Missouri, the Central District of California, and elsewhere,

**BRENDON DARNELL THOMAS,
JOSEPH ROBERT HOLLIMAN,
DEDRICK DESHON JORDAN,
TERRY JAMES WILLIAMS,
CLIFFORD DWIGHT DAVIS, JR.,
MARIA D. FLORES-CERVANTES,
JACQUELINE RENEE HARRIS,
THOMAS WILLIAM FOGLE,
RICHARD LEROY CLARK,
SARAH NICOLE REYNOLDS,
JOSEPH MICHAEL SURAUD,
ALEXANDRA MARNI CHAMBERS,
DEIDRE DENISE MEDCALF,
DAVID MICHAEL NUELLE,
MATTHEW JOSEPH AUBIN and
KEVIN JOHN KARLL,**

the defendants herein, did knowingly combine, conspire and agree with each other, and with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate or foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, to distribute and possess with intent to distribute controlled substances to include methamphetamine, a Schedule II controlled substance, knowing the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Count I, the defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violation set forth in Count I.

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) or 924(c) as set forth in Counts II through VII, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violations.

4. Specific property subject to forfeiture includes, but is not limited to, the following:

- a) Taurus model The Judge 410 revolver bearing SN#KR220028;
- b) Mossberg model 590 Mariner 12 gauge shotgun bearing SN#L533533;
- c) Tula SKS model 1954r rifle bearing SN#HN3003;
- d) A Tack Life electronic money counter;
- e) Approximately \$17,520.00 U.S. currency;
- f) Silver Rolex wristwatch;
- g) Light blue Rolex wristwatch;
- h) Silver/black Rolex wristwatch;

- i) Gold Rolex wristwatch;
- j) Blue Apple iPhone 11;
- k) Black LG smartphone;
- l) Black Nokia Tracphone;
- m) 2012 Mercedes Benz CLS550 sedan, VIN #WDDLJ7DBXCA030352;
- n) Approximately \$129,776.00 U.S. currency;
- o) Samsung QLED 65" television;
- p) Digital scale;
- q) Springfield Armory USA XD-9 subcompact 9 millimeter bearing SN#GM714291;
- r) Springfield Armory USA XD-9 subcompact 9 millimeter bearing SN#HG927781;
- s) Heckler & Kock, Inc. .22 caliber rifle bearing SN#HB007571;
- t) One box Amcor 10mm 180 grain full metal jacket ammunition;
- u) Five 9mm magazines and twenty rounds of 9mm ammunition;
- v) Springfield Armory gun box serial number HG927781/UPC code XDSG93398T;
- w) Springfield Armory gun box serial number GM714291/UPC code XDG9801HC;
- x) 2015 Dodge Charger with title VIN #2C3CDXH9FH765888;
- y) Two digital scales;
- z) Colt MK IV semi-automatic pistol serial #RR12438.

5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

PAUL J. D'AGROSA (#36966MO)
Assistant United States Attorney